

Rachel Geman (*pro hac vice*)
rgeman@lchb.com
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
250 Hudson Street, 8th Floor
New York, NY 10013-1413
Telephone: 212.355.9500
Facsimile: 212.355.9592
Email: rgeman@lchb.com

Elizabeth J. Cabraser, Esq.
Daniel M. Hutchinson, Esq.
Reilly T. Stoler, Esq.
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: 415.956.1000
Email: ecabraser@lchb.com
dhutchinson@lchb.com
rstoler@lchb.com

Kenneth S. Byrd. (*pro hac vice*)
Betsy A. Sugar (*pro hac vice*)
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
222 2nd Avenue South, Suite 1640
Nashville, TN 37201-2375
Telephone: 615.313.9000
Email: kbyrd@lchb.com
bsugar@lchb.com

Scott J. Sholder (*pro hac vice*)
CeCe M. Cole (*pro hac vice*)
COWAN DEBAETS ABRAHAMS & SHEPPARD LLP
60 Broad Street, 30th Floor
New York, New York 10004
Telephone: 212.974.7474
Email: ssholder@cdas.com
ccole@cdas.com

*Attorneys for Plaintiff Christopher Farnsworth and
Representative Plaintiffs and the Proposed Class*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD KADREY, *et al.*,
Individual and Representative
Plaintiffs,
v.
META PLATFORMS, INC, a Delaware
corporation,
Defendant.

Case No. 3:23-cv-03417-VC

**DECLARATION OF BETSY SUGAR IN
SUPPORT OF STIPULATION AND
[PROPOSED] ORDER RE EXPERT
DISCOVERY DEADLINE**

1 I, Betsy Sugar, hereby declare:

2 1. I am an Associate with the law firm Lieff Cabraser Heimann & Bernstein LLP,
3 counsel for Plaintiff Christopher Farnsworth and Representative Plaintiffs and the Proposed Class
4 (“Plaintiffs”) in this matter. I submit this declaration in support of the Parties’ Stipulation re Expert
5 Discovery Deadline. I declare that the following is true to the best of my knowledge, information
6 and belief, and that if called upon to testify, I could and would testify to the following:

7 2. Given that both Dr. Daniel Spulber and Dr. Michael Sinkinson are based in Chicago,
8 the Parties agreed it would be most feasible to schedule the depositions on back-to-back days. Dr.
9 Spulber was unavailable in late February due to needing to care for his wife after surgery, and the
10 Parties agreed to take the depositions after the current close of expert discovery during the first
11 week of March.

12 3. Defendant was unavailable for the date proposed by Plaintiffs for Dr. Jonathan
13 Krein’s deposition and requested an alternate date, stating that a date after the close of expert
14 discovery would be acceptable. The Parties agreed to take the deposition after the current close of
15 expert discovery during the first week of March.

16 4. Dr. Crista Lopes has offered a supplemental report and will make herself available
17 for supplemental deposition as early as possible in light of a surgery she underwent on February
18 18, 2025.

19 5. In light of these unavoidable conflicts, the parties agree to modestly extend the
20 expert discovery deadline from February 26, 2025 until March 7, 2025 to afford sufficient time for
21 all expert depositions to occur.

22 6. The extension of the expert discovery deadline to March 7, 2025 will not impact
23 any subsequent dates in the Scheduling Order, including the deadlines for summary judgment and
24 *Daubert* motions.

25 I declare under penalty of perjury that the foregoing is true and correct. Executed on this
26 26th day of February at Nashville, TN.

27 By: /s/ Betsy Sugar
28 Betsy Sugar

1 Rachel Geman (*pro hac vice*)
2 rgeman@lchb.com
3 LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
4 250 Hudson Street, 8th Floor
5 New York, NY 10013-1413
6 Telephone: 212.355.9500
7 Facsimile: 212.355.9592
8 Email: rgeman@lchb.com

9 Elizabeth J. Cabraser, Esq.
10 Daniel M. Hutchinson, Esq.
11 Reilly T. Stoler, Esq.
12 LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
13 275 Battery Street, 29th Floor
14 San Francisco, CA 94111-3339
15 Telephone: 415.956.1000
16 Email: ecabraser@lchb.com
17 dhutchinson@lchb.com
18 rstoler@lchb.com

19 Kenneth S. Byrd. (*pro hac vice*)
20 Betsy A. Sugar (*pro hac vice*)
21 LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
22 222 2nd Avenue South, Suite 1640
23 Nashville, TN 37201-2375
24 Telephone: 615.313.9000
25 Email: kbyrd@lchb.com
26 bsugar@lchb.com

27 Scott J. Sholder (*pro hac vice*)
28 CeCe M. Cole (*pro hac vice*)
COWAN DEBAETS ABRAHAMS & SHEPPARD LLP
60 Broad Street, 30th Floor
New York, New York 10004
Telephone: 212.974.7474
Email: ssholder@cdas.com
ccole@cdas.com

*Attorneys for Plaintiff Christopher Farnsworth and
Representative Plaintiffs and the Proposed Class*